

THE HONORABLE RICHARD A. JONES

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

STEVE TEIXEIRA,

Plaintiff,

v.

MOZILLA CORPORATION a.k.a. M.F.
Technologies, a California corporation;
MOZILLA FOUNDATION, a California
public benefit corporation; LAURA
CHAMBERS and her marital community;
WINIFRED MITCHELL BAKER and her
marital community, and DANI CHEHAK and
her marital community,

Defendants.

Case No.: 2:24-CV-01032-RAJ

DECLARATION OF AMY
ALEXANDER IN SUPPORT OF LCR
37 SUBMISSION

I, Amy Alexander, am over the age of 18, have personal knowledge of all the facts stated herein and declare as follows:

1. I am an attorney at Stokes Lawrence, P.S. and am counsel of record for Plaintiff Steve Teixeira. I submit information about fees and expenses in connection with this LCR 37 submission in compliance with LCR 37(a)(2)(F) to substantiate the fees incurred by my client in resisting unlawful discovery from Mozilla Corporation in this matter.

2. My qualifications, fees, and those of my colleagues are accurately described in ECF 32 (Declaration of Maricarmen Perez-Vargas).

DECLARATION OF AMY ALEXANDER IN SUPPORT OF LCR
37 SUBMISSION - 1
60606-003

STOKES LAWRENCE, P.S.
1420 FIFTH AVENUE, SUITE 3000
SEATTLE, WASHINGTON 98101-2393
(206) 626-6000

1 3. It is my opinion that the rates billed by attorneys in this matter are commensurate
2 with rates of attorneys with similar experience who represent clients in complex employment-
3 related lawsuits such as this one, involving the tech industry and involving significant damages.
4 It is my opinion that the rates billed by Ms. Armon are commensurate with rates of paralegal
5 professionals of similar experience. This judgment is informed by my experience litigating fee
6 petitions in the state and federal courts within this market, and also informed by the opinion of
7 Mr. Harrington, who until several years ago served on our firm's management committee and
8 was involved in setting rates for our firm of 60 lawyers.

9 4. The table attached hereto as **Exhibit A** summarizes and describes certain time
10 Stokes Lawrence, P.S. expended on Mr. Teixeira's behalf (subject to exclusions described
11 below) and billed to him for efforts to oppose discovery of privileged or irrelevant medical
12 records that are the subject of Mozilla Corporation's RFP 8, 9, and 10 and this motion to compel.
13 This table was created using information from a report generated by Stokes Lawrence's
14 accounting system that summarizes the compensable time spent by the firm for services
15 performed on Plaintiff's behalf in connection with this lawsuit. The narratives in Exhibit A were
16 drafted at or near the time the work was done, have been reviewed for accuracy by me, and,
17 where appropriate, have been cross-referenced against work product and notes in our files. I
18 excluded time entries in compliance with the Western District of Washington's lodestar method
19 of calculating a reasonable fee award. I endeavored to err on the conservative side when deciding
20 whether to include a particular time entry in this compilation of fees. In order to be conservative,
21 and to exclude any time unrelated to this Motion and the discovery requests at issue herein, I
22 have made deductions for entries that included work on unrelated issues, in addition to the
23 removal of miscellaneous or unrelated time entries.

Exhibit A

<u>Date</u>	<u>Tkpr/Exp</u>	<u>Activity Descripti</u>	<u>Qty</u>	<u>Rate</u>	<u>Amount</u>
02/06/2025	Maricarmen C. Perez-Vargas		0.50	\$ 450.00	\$ 225.00
Review discovery deficiency letter from Mozilla Corporation and outline response to same.					
02/07/2025	Amy K. Alexander		0.10	\$ 475.00	\$ 47.50
Strategy re discovery deficiency letter from Mozilla Corp.					
02/25/2025	Amy K. Alexander		1.20	\$ 475.00	\$ 570.00
Prepare for and attend meet and confer with Mozilla Corporation regarding Teixeira discovery production and responses. (1.2)					
02/25/2025	Maricarmen C. Perez-Vargas		2.30	\$ 450.00	\$1,035.00
Attend discovery conference. Prepare for same.					
02/25/2025	Sarah J. Armon		0.50	\$ 425.00	\$ 212.50
Meet and confer with opposing counsel re Teixeira discovery responses; follow up call with attorneys Maricarmen Perez-Vargas and Amy Alexander re same.					
03/06/2025	Amy K. Alexander		0.20	\$ 475.00	\$ 95.00
Discuss strategy for emotional distress damages and waiver of physician-patient privilege.					
03/26/2025	Amy K. Alexander		0.50	\$ 475.00	\$ 237.50
Discovery strategy regarding waiver of health care privileges.					
03/26/2025	Maricarmen C. Perez-Vargas		0.70	\$ 450.00	\$ 315.00
Analyze waiver of healthcare privilege [0.7].					
04/03/2025	Amy K. Alexander		1.00	\$ 475.00	\$ 475.00
Strategy regarding medical records production (1).					
04/09/2025	Amy K. Alexander		2.00	\$ 475.00	\$ 950.00
Research and draft correspondence to Mozilla Corp regarding production of Plaintiff medical records, and confer with attorney Mathew Harrington regarding same (2).					
04/11/2025	Amy K. Alexander		1.50	\$ 475.00	\$ 712.50
Review medical records (1.5).					
04/14/2025	Amy K. Alexander		0.30	\$ 475.00	\$ 142.50
Correspondence with A. Cates regarding production of medical records (.3).					
04/14/2025	Sarah J. Armon		0.40	\$ 425.00	\$ 170.00
Review remaining medical records for attorney Amy Alexander and email regarding same (.4)					
04/16/2025	Amy K. Alexander		0.80	\$ 475.00	\$ 380.00
Review message from A. Cates regarding production of medical records and draft response to same (.8).					
04/23/2025	Amy K. Alexander		4.00	\$ 475.00	\$1,900.00
Review Mozilla motion to compel, research and initial draft response to same (4).					

04/26/2025	Amy K. Alexander	2.50	\$ 475.00	\$1,187.50
Continue drafting opposition to motion to compel health records.				
04/27/2025	Amy K. Alexander	2.00	\$ 475.00	\$ 950.00
Continue drafting opposition to Mozilla Motion to Compel, including declaration.				
				\$9,605.00